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March 1, 2010

**VIA ELECTRONIC FILING**

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Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Suite TW-A325  
Washington, DC 20554

Re: San Juan Cable LLC - Annual CPNI Compliance Certification  
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of San Juan Cable LLC d/b/a OneLink Communications ("OneLink"), pursuant to 47 C.F.R. § 64.2009(e), please find enclosed OneLink's annual CPNI compliance certification for calendar year 2009 and an accompanying statement describing OneLink's CPNI compliance policies and procedures.

Very truly yours,



Aaron M. Bartell

Counsel to San Juan Cable LLC

Enclosures

**Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009**

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1. Date filed: March 1, 2010
2. Name of company covered by this certification: San Juan Cable LLC d/b/a OneLink Communications
3. Form 499 Filer ID: 826287
4. Name of signatory: Jorge Hernandez
5. Title of signatory: Vice President and Chief Financial Officer
6. Certification:

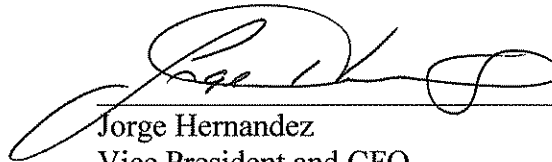
I, Jorge Hernandez, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
Jorge Hernandez  
Vice President and CFO

**Attachment:** Accompanying Statement explaining CPNI procedures

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## STATEMENT OF COMPLIANCE WITH CUSTOMER PROPRIETARY NETWORK INFORMATION RULES

San Juan Cable LLC d/b/a OneLink Communications (the “Company”) has established the following operating procedures to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the regulations issued by the Federal Communications Commission (the “Commission”) regarding protection of customer proprietary network information (“CPNI”).

**1. Employee Training; Supervisory Review Process.** Company personnel are trained to understand what CPNI is and when they are and are not authorized to use or disclose CPNI. Nevertheless, Company personnel are not permitted to make any decisions regarding use of CPNI without first consulting with a supervisor from the Customer Operations Department. In deciding whether the contemplated use of the CPNI is proper, supervisors consider one or more of the following: the Company’s own compliance policies, applicable Commission regulations, and the Commission’s Small Entity Compliance Guide regarding CPNI. If necessary, the Company also consults legal counsel.

**2. Application of Disciplinary Policy.** The Company has disciplinary policies and procedures in place, and such policies and procedures are applied to Company personnel who use or disclose CPNI without authorization or in an improper manner.

**3. Customer Access to CPNI; Authentication.** The Company does not disclose CPNI to customers (or anyone else) over the telephone; if customers want to access CPNI, they must visit the Company in person and present valid photo identification or sign into their online accounts. The Company requires password authentication for customer-initiated access to customers’ online accounts. These passwords, as well as the procedure used to authenticate a caller’s identity if such caller has forgotten his or her password, effectively protect customers’ CPNI from “data brokers.”

**4. Non-Disclosure of CPNI where Customer Approval Required.** The Company’s policy is not to use CPNI, or to disclose CPNI to third parties, for purposes that would require customer approval. If in the future that policy changes, the Company will comply with the notice and consent requirements set forth in the Commission’s rules.

**5. Use of CPNI for Permitted Purposes.** The Company may use CPNI, or share CPNI with contractors (acting as agents of the Company), for purposes expressly authorized by Section 222(d) of the Communications Act, such as initiating, rendering, and billing and collecting for telecommunications services, as well as engaging in limited inbound telemarketing and administrative services during calls initiated by customers.

**6. Computer System Encryption.** As encouraged by the Commission, the Company has implemented additional CPNI protective measures. All of the Company’s

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computer systems and databases containing CPNI are encrypted to prevent unauthorized access.

**7. Internal Investigation of Attempted “Pre-Texting”.** The Company is cognizant of the dangers of “pretexting,” and therefore, in the event that the Company detects attempts by so-called “data brokers” to use pretexting against it or otherwise to access CPNI, the Company will conduct an internal investigation to determine the source of the problem and the most appropriate resolution, which may involve reporting such pretexting activity to the FCC or other applicable governmental authorities.

**8. Notification of Breach – Law Enforcement and Customers.** In the event that the Company discovers a breach of customers’ CPNI, the Company will report such breach to law enforcement officials and the affected customers in accordance with the Commission’s rules.

**9. No Customer Complaints During 2009.** The Company has not received any customer complaints with respect to misuse, unauthorized disclosure, or other problems with respect to its handling or protection of CPNI since January 1, 2009.